

EXHIBIT 2

1
2
3
4
5
6
7
8
9
10 The Honorable Laura C. Inveen
11
12
13
14

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

15 D.F.,

16 Plaintiff,

17 v.

18
19
20
21 THE CORPORATION OF THE PRESIDENT
22 OF THE CHURCH OF JESUS CHRIST OF
23 LATTER-DAY SAINTS, a Utah corporation
24 sole; LDS SOCIAL SERVICES a/k/a LDS
25 FAMILY SERVICES, a Utah corporation; and
26 the "MORMON CHURCH" THE CHURCH
27 OF JESUS CHRIST OF LATTER-DAY
28 SAINTS, an unincorporated association,

29
30 Defendants.

31 NO. 06-2-18131-0 KNT

32
33
34
35
36
37
38
39
40
41
42
43
44
45
SECOND DECLARATION OF PAUL
D. RYTTING IN SUPPORT OF
REPLY BRIEF IN SUPPORT OF
MOTION TO DISMISS AND/OR
MOTION FOR SUMMARY
JUDGMENT

I, Paul D. Rytting, declare as follows:

1. My name is Paul D. Rytting. I am over the age of eighteen, and I make these
statements based upon personal knowledge.

2. I have been a member of The Church of Jesus Christ of Latter-day Saints ("the
Church") all of my life. I currently function as the Director of the Church's Risk Management
Division and have served in similar positions for fifteen years.

SECOND DECLARATION OF PAUL D. RYTTING IN
SUPPORT OF REPLY BRIEF IN SUPPORT OF MOTION TO
DISMISS AND/OR MOTION FOR SUMMARY JUDGMENT - 1

GORDON MURRAY TILDEN LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154-1007
Phone (206) 467-6477
Fax (206) 467-6292

1 3. I also serve as the bishop of my ward (congregation) of the Church in the Salt
2 Lake area and am familiar with the corporate organization of Corporation of the President of The
3 Church of Jesus Christ of Latter-day Saints ("COP"), the organization of the Church, the
4 financial operations of local wards, and the polity, policy, and beliefs of the Church.
5
6

7 4. Missionary work is a deep spiritual obligation of every member of the Church.
8
9

10 5. The payment of tithing is a spiritual obligation and a privilege. The payment of
11 tithing is considered a privilege of membership with associated blessings. Members make an
12 annual, personal declaration to their bishop of whether they tithe, but no one's membership is
13 revoked for failing to do so. Although the Church will accept certain in-kind donations as
14 tithing, it does so exclusively through a corporate entity like COP – the Church as an
15 unincorporated association does not take title to real property.
16
17

18 6. The Church does not own or lease any property used by local missions. COP
19 funds the operation of local missions.
20
21

22 7. The donated funds collected by local wards are deposited in local banks. Within
23 24 hours, those accounts are swept into a central account owned by COP.
24
25

26 8. The checking (disbursement) account used by domestic local wards and stakes is
27 owned by Corporation of the Presiding Bishop of The Church of Jesus Christ of Latter-day
28 Saints ("CPB"). Funds in this account are provided by COP from contributed revenue, including
29 tithing.
30
31

32 9. The budget of a local ward is an amount allocated to local units by COP and CPB.
33 The local units are aided greatly in tracking and administering budgets by COP and CPB
34 employees. The "budget" of a local unit is not connected to the amount of donations received.
35
36

1 10. Fast offerings are used solely for the purpose of providing for the poor and needy.
2

3 Fast offering donations are collected by local wards, but are also deposited in local bank
4 accounts that are swept into a central COP account.
5

6 11. Local leaders sign checks on the CPB account to provide for the needy in their
7 area. In most instances, the Church does not have to pay for food or other commodities provided
8 to the needy inasmuch as CPB and affiliated entities operate their own farms and other facilities
9 for welfare purposes. Thus, the Church can simply provide food and other commodities to the
10 needy, which may include people of other faiths. Money to pay for needed items not available
11 within the system comes from COP, not Church, bank accounts via the CPB disbursement
12 account.
13

14 12. Welfare operations and facilities are all owned and operated by CPB and other
15 corporate entities, not the Church.
16

17 13. Local wards and stakes and their bishops and stake presidents do not do enter into
18 contracts. They do not buy the furniture in their buildings. They do not employ the maintenance
19 staff or even pay the light bill. They do not own or maintain the properties.
20

21 I declare under penalty of perjury that the foregoing is true and correct.
22

23 SIGNED at Salt Lake City, Utah, this 5th day of February, 2007.
24

25 
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45

PAUL D. RYTTING

SECOND DECLARATION OF PAUL D. RYTTING IN
SUPPORT OF REPLY BRIEF IN SUPPORT OF MOTION TO
DISMISS AND/OR MOTION FOR SUMMARY JUDGMENT - 3

GORDON MURRAY TILDEN LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154-1007
Phone (206) 467-6477
Fax (206) 467-6292